

EXHIBIT 5

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT; MICHELLE) Case No.
DAVIS; and CLYDE DAVIS,) 18-CV-5838-PJW

Plaintiffs,

vs.

COUNTY OF LOS ANGELES, a public
entity; LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT, a law
enforcement agency; SHERIFF JIM
McDONNELL; MIZRAIN ORREGO, a
Deputy Los Angeles County
Sheriff; SAMUEL ALDAMA, a
Deputy Los Angeles County
Sheriff; and DOES 1 through
100, inclusive,

Defendants.

VIDEOTAPED DEPOSITION OF DEPUTY AUSTREBERTO GONZALEZ

Volume I

Via Videoconference

Tuesday, August 11, 2020

Reported by:

Gideon Choi

CSR No. 13258

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1 BY MR. SWEENEY: 11:16:46

2 Q What is your knowledge based on, sir? 11:16:47

3 A My knowledge is that after a shooting, there is 11:16:49

4 998 debriefs. People get invited, certain people, not 11:16:54

5 everybody at the station. They go to a bar, they have 11:17:00

6 drinks, they celebrate together, and oftentimes the 11:17:04

7 deputy and the partner will get inked afterwards. 11:17:12

8 Q Okay. And have you found that these inkings are 11:17:14

9 like a reward for doing the shooting? 11:17:21

10 MR. IVIE: Objection; leading; suggestive. 11:17:31

11 MR. NISHIMURA: Lacks foundation. 11:17:33

12 THE WITNESS: Well, I mean, yes. What else can you 11:17:35

13 call it? I think it is some type of reward. A lot of 11:17:38

14 deputies, we call them prospects because, you know, 11:17:44

15 they're hurting and they're want that. They acknowledge 11:17:47

16 they're chasing ink which is, you know, that they want 11:17:50

17 to get inked. And so call it coincidence. I mean, you 11:17:53

18 know, they get inked oftentimes after a shooting. 11:17:59

19 BY MR. SWEENEY: 11:18:04

20 Q You said or you used the term "chasing ink"; is 11:18:05

21 that what you said? 11:18:09

22 A Yes. 11:18:09

23 Q So with this gang, it's your testimony that 11:18:10

24 prospects are encouraged to do shootings or violent acts 11:18:21

25 in order to get inked? 11:18:27

1 MR. IVIE: Objection; leading; suggestive; no 11:18:29
2 foundation. 11:18:31
3 THE WITNESS: It is my knowledge that by common 11:18:34
4 practice with the group, that if you quote/unquote 11:18:40
5 "work", if you're cooking, if you are involved in a 11:18:45
6 shooting, I mean, like I said, history will show that 11:18:52
7 they get inked. So we call it ink chasers because 11:18:56
8 they're out there trying to show the rest of the 11:19:00
9 members, the rest of the inked members that, you know, 11:19:04
10 they're worthy of that tattoo. 11:19:07
11 BY MR. SWEENEY: 11:19:09
12 Q Have you heard anyone say or do you have any 11:19:11
13 knowledge -- strike that. 11:19:14
14 Do you have any knowledge that Deputy Aldama was 11:19:14
15 chasing ink when he did his shooting of a citizen? 11:19:21
16 MR. IVIE: Objection; leading; suggestive; and no 11:19:26
17 foundation. 11:19:28
18 MR. SWEENEY: You can answer. 11:19:34
19 THE WITNESS: Could you repeat the question? I'm 11:19:35
20 sorry. 11:19:36
21 BY MR. SWEENEY: 11:19:37
22 Q Sure. Do you have any knowledge that 11:19:37
23 Deputy Aldama was, as you said, chasing ink when he shot 11:19:40
24 a citizen? 11:19:46
25 MR. IVIE: Leading; no foundation. 11:19:47

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CERTIFICATION

OF

CERTIFIED SHORTHAND REPORTER

I, the undersigned, a Certified Shorthand Reporter of the State of California do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is and accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name



Gideon Choi, CSR

Certificate No. 13258

Dated: August 12, 2020

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